

EXHIBIT

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**SUBIN ASSOCIATES, LLP'S RESPONSE TO THE
JULY 8, 2024 DECISION & ORDER OF THE
HONORABLE ROBERT I CALORAS, J.S.C. INDEX
No. 701227-2021 SOLORZANO v 30 COOPER
SQUARE PARTNERSHIP et al**

Pursuant to Justice Caloras' July 8, 2024 Order, Subin Associates LLP provides the following information to the defendants and the Court.

The referral process involved in this case is as follows:

1. The Subin firm was referred the Solorzano matter by Ari Alay, 9 Wimbleton Lane, Great Neck, New York.
2. OCA Retainer Statements were signed by Herbert Subin, Esq.
3. There came a point in time when Subin Associates LLP received letters from two defense-related private groups, Ionian RE: LLC (dated December 8, 2023), a captive insurance program; and Andromeda Advantage Inc., a group of construction companies and clients (dated

January 12, 2024). Both letters expressed a belief that there was a pattern of fraud within the construction industry as to Scaffold Law cases brought and intimated that Subin Associates LLP had represented one or more plaintiffs in fraudulent cases.

4. Subin Associates LLP thereafter retained former First Department Appellate Division Justice James Catterson of the Pillsbury Winthrop Shaw Pittman LLP law firm, and in consultation with other ethics counsel, the firm made a decision to withdraw over a period of time from several hundred labor law cases.
5. Pursuant to the Subin Associates LLP outside ethics counsel's advice, the firm's Orders to Show Cause revealed the least amount of information necessary to provide the basis for a withdrawal from the cases.

Dated: August 7, 2024

Respectfully,


Leslie Nizin

*Attorney for Subin Associates LLP
on the Motion to Withdraw*